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Attorneys for Defendant John Deere Shared Services, LLC

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

EMERALD SITE SERVICES, INC., a)	Case No. 2-23-cv-02982-DJC-AC
California Corporation,)	[The Honorable Daniel J. Calabretta]
)	
Plaintiff,)	
)	STIPULATION AND ORDER
v.)	REGARDING BRIEFING SCHEDULE
)	AND HEARING DATE FOR
PAPÉ MACHINERY, INC., an Oregon)	DISPOSITIVE MOTIONS
Corporation; JOHN DEERE)	
CONSTRUCTION & FORESTRY)	
COMPANY, a Delaware Corporation;)	
DEERE & COMPANY, a Delaware)	
Corporation; and DOES 1-100, inclusive,)	
)	
Defendants.)	
_____)	

The parties to this action, Emerald Site Services, Inc., Papé Machinery, Inc., and John Deere Shared Services, LLC, stipulate as follows:

Whereas the current Scheduling Order (ECF No. 9) provides for a filing deadline for dispositive motions of October 3, 2025, and a hearing date of December 4, 2025.

Whereas the parties have met and conferred regarding Defendants' intent to file motions for summary judgment, and propose the following briefing schedule for dispositive motions:

Dispositive Motion Filing Deadline:	October 20, 2025
Oppositions:	November 10, 2025
Replies:	November 20, 2025

STIPULATION AND ORDER REGARDING BRIEFING SCHEDULE AND HEARING DATE FOR DISPOSITIVE MOTIONS

Whereas the parties are amenable to a dispositive motion hearing date of December 18, 2025.

Therefore, the parties request that the Court continue the dispositive motion briefing schedule and hearing date as set forth above.

IT IS SO STIPULATED.

Dated: September 18, 2025

KROGH & DECKER, LLP

/s/ Trevor A. White
By: (As authorized on 9/17/25)
SHAWN M. KROGH
TREVOR A. WHITE
Attorneys for Plaintiff
EMERALD SITE SERVICES, INC.

Dated: September 18, 2025

LEWIS BRISBOIS BISGAARD & SMITH LLP

/s/ Graham M. Cridland
By: (As authorized on 9/18/25)
CHARLES S. PAINTER
GRAHAM M. CRIDLAND
Attorneys for Defendant
PAPÉ MACHINERY, INC.

Dated: September 18, 2025

THE RYAN LAW GROUP

/s/ Rebekka R. Martorano
By: _____
TIMOTHY J. RYAN
REBEKKA R. MARTORANO
Attorneys for Defendant
JOHN DEERE SHARED SERVICES, LLC

ORDER

Pursuant to the stipulation of the parties, the Scheduling Order in this case (ECF No. 9) is amended and a briefing schedule is approved as follows:

Dispositive Motion Filing Deadline: October 20, 2025

Oppositions: November 10, 2025

Replies: November 20, 2025

Dispositive motion hearing date: December 18, 2025, 1:30 p.m.

Dated: September 18, 2025

/s/ Daniel J. Calabretta

THE HONORABLE DANIEL J. CALABRETTA
UNITED STATES DISTRICT JUDGE